

APPENDIX A

Timeline of Meta Productions *After* Fact Discovery Cut-Off

Event / Deadline	Date	Size	Notes
Close of Fact Discovery	December 13, 2024		
Document Production	December 13, 2024	2,404 Documents	<p>Meta produces key documents, including:</p> <ul style="list-style-type: none"> • Documents discussing torrenting Anna's Archive from non-Meta IP; • Internal memo showing LibGen was approved by Mark Zuckerberg despite Meta knowing it was a website that trafficked in pirated works; and • Documents discussing the incompatibility of licensing and fair use.
Service of First Rebuttal Report of Meta Expert Barbara Frederiksen-Cross	February 10, 2025		Frederiksen-Cross relied on informal interviews with Meta employees, none of which Meta identified in its Initial Disclosures and some of whom were not deposed. The report also revealed, for the first time, the contents of Meta's torrenting, although Meta's recent productions have confirmed it was incomplete.

Event / Deadline	Date	Size	Notes
Document Production	February 10-12, 2025	1,348 Total Documents	<p>After disclosing there were 18,000 records it sequestered during the discovery period, Meta produces 1,348 files, including key documents such as:</p> <ul style="list-style-type: none"> • The first statements showing knowledge of the heightened legal risk of torrenting relative to direct download from shadow libraries; • Explicit mention of seeding in connection with Meta's peer-to-peer files sharing of copyrighted works; • Discussion of the "legal tradeoffs" of torrenting LibGen as opposed to licensing books; and • Evidence of halting licensing efforts due to torrenting LibGen.
Close of Expert Discovery	March 7, 2025		Originally scheduled for February 26, 2025, and later extended by stipulation.
Document Production	March 19-April 1, 2025	282 Documents	In response to Plaintiffs' baseball arbitration RFP after Meta's production of sequestered documents, Meta produces 282 documents limited to four new custodians but none of the original ones.

Event / Deadline	Date	Size	Notes
Minute Order, Dkt. 500	March 26, 2025		The Court declines “at this late stage” to address the parties’ discovery dispute over the baseball arbitration discovery (the production of additional AWS records and Meta’s failure to run Plaintiffs’ search string against the original Meta custodians’ files) but says Plaintiffs can raise the issue if applicable in summary judgment briefing. The Court also states: “Given the magnitude of this case, Meta is urged to take a ‘when in doubt, produce it’ approach.”
Service of Second Rebuttal Report of Meta Expert Barbara Frederiksen-Cross	April 1, 2025		Identifies the first affirmative evidence of Meta uploading to other Internet users via torrenting or peer-to-peer file sharing. Frederiksen-Cross calculated that Meta uploaded 40.42 Terabytes of shadow library data to other users in the course of its 2024 torrenting of Anna’s Archive.

Event / Deadline	Date	Size	Notes
Fed. R. Civ. P. 30(b)(6) Deposition of Meta Corporate Representative Christopher King and Production of Prep Binder with Torrenting Timeline and Samples of New Logs	April 2, 2025		<p>Meta produced a summary document prepared by counsel and used to educate Mr. King as a corporate witness – that document showed the technical infrastructure Meta used to conduct its 2022, 2023, and 2024 torrenting episodes, though Meta’s recent productions confirm it was incomplete.</p> <p>Mr. King identifies that he, like Ms. Frederiksen-Cross, informally interviewed Xiaolan Wang regarding “torrent downloads,” and identifies a previously unidentified Meta employee named Tim Eberhard that Mr. King interviewed about “existence of logs: (1) forward proxy (2) devserver shell history; 1 year in hive for each.”¹ Meta also produces with Mr. King’s prep binders “samples” of file lists and log files associated with Mr. Lample’s 2022 torrenting.</p>

¹ Exhibit T.

Event / Deadline	Date	Size	Notes
Deposition of Meta Expert Barbara Frederiksen-Cross	April 4, 2025		<p>Frederiksen-Cross testified she did not “look at Meta’s torrenting activity from the year 2022” and she was “not specifically aware of any” “downloading in 2022” by Meta.²</p> <p>She also testified that, with respect to whether Meta torrented LibGen Fiction, she would “want to examine the contents of those datasets,” which she had not done³</p>
Document Production	April 29, 2025	79,212 Files	Meta produces what it represents were all of the logs of Guillaume Lample’s 2022 torrenting of LibGen Fiction and Non-Fiction.
First Summary Judgment Hearing	May 1, 2025		
Case Management Conference	July 11, 2025		The Court permits Plaintiffs to brief the prior, unresolved discovery dispute over the baseball arbitration discovery—additional AWS records and running Plaintiffs’ search string against Meta’s original custodians’ files. <i>See</i> Dkt. 500.

² Exhibit U at 219:16-20, 223:12-14.

³ Exhibit U at 238:1-239:4.

Event / Deadline	Date	Size	Notes
Discovery Order	August 1, 2025		Judge Hixson grants Plaintiffs' request in part (<i>see</i> prior row) and orders Meta to run Plaintiffs' baseball arbitration search string against Meta's 15 original custodians.
Document Production	August 30, 2025	67 Documents	Meta produces key documents, including a heavily redacted dashboard for Anna's Archive from a previously undisclosed non-custodial source called ML Hub, which contains a repository called Meta's AI Data Catalog ("AIDC").
Document Production	September 4, 2025	2 Files	Meta produces additional logs from Guillaume Lample's LibGen torrenting in 2022.
Document Production	September 12, 2025	5 Files/Documents	Meta produces the contents of the Xiaolan Wang's S3 repository, which includes evidence of torrenting from LibGen Fiction in 2024. Meta also discloses additional virtual computers it used to torrent from Anna's Archive in 2024 and produces more AWS billing data.

Event / Deadline	Date	Size	Notes
Joint Letter Brief re Meta Clawback and Privilege Claims over Meta's AIDC - Anna's Archive Dashboard	September 16, 2025		Plaintiffs challenge Meta's clawback of redactions to non-attorney entries in the AIDC – Anna's Archive dashboard that revealed for the first time that Meta initially blocked acquiring Anna's Archive data via torrent. Plaintiffs also challenge the other redactions to dashboard entries under the crime-fraud doctrine.
Document Production	September 24, 2025	2 Documents	Meta produces more AWS billing data.
Discovery Order	September 24, 2025		Judge Hixson grants in part Plaintiffs' request and order Meta to produce unredacted the non-attorney entries in the AIDC – Anna's Archive dashboard but hold the crime-fraud doctrine does not apply because the entries in the dashboard were ostensibly made after Meta's torrenting from Anna's Archive ended.
Document Production	October 8, 2025	2 Documents	Meta reproduces two AIDC dashboards – including the Anna's Archive dashboard – pursuant to Judge Hixson's order.

Event / Deadline	Date	Size	Notes
Document Production	October 14, 2025	16 Documents	Meta produces more screen captures of the AIDC – Anna’s Archive dashboard and—for the first time—produces AIDC dashboard screen captures for LibGen and a new dataset called LibGen – Anna Archive.
Forthcoming Document Productions	October 17-24, 2025		Meta states it will produce additional files relating to its 2022 LibGen downloading and security alerts relating to Meta’s 2024 torrenting. Meta also confirms it has located additional computer logs that contain more than 80 TB of data relating to Meta’s torrenting. Plaintiffs ask Meta to produce the files immediately. Meta responds it is “creating . . . file lists” of certain logs and will produce those lists “shortly.”
Additional Forthcoming Document Productions	October 27, 2025		Meta states it has located evidence of additional torrenting of LibGen Non-fiction (Scitech) between May 29 and June 2, 2024. Meta says it will produce a list of LibGen Non-Fiction files that were downloaded, as well as parquet files generated from the download. Both parties agree LibGen Non-Fiction contains copies of Plaintiffs’ Asserted Works.